**Hearing Date: June 23, 2011** 

Hearing Time: 10:00 a.m. (prevailing Eastern time)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 155 North Wacker Drive Chicago, Illinois 60606 John Wm. Butler, Jr. John K. Lyons

- and -

Ron E. Meisler

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP Four Times Square New York, New York 10036

Attorneys for DPH Holdings Corp., <u>et al.</u>, Reorganized Debtors

DPH Holdings Corp. Legal Information Hotline:

Toll Free: (800) 718-5305 International: (248) 813-2698

 $DPH\ Holdings\ Corp.\ Legal\ Information\ Website:$ 

http://www.dphholdingsdocket.com

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

----- x

In re : Chapter 11

:

DPH HOLDINGS CORP., et al., : Case No. 05-44481 (RDD)

(Jointly Administered)

Reorganized Debtors.

REORGANIZED DEBTORS' SUPPLEMENTAL REPLY WITH RESPECT TO PROOFS OF ADMINISTRATIVE EXPENSE CLAIM NUMBERS 18722 AND 19714

("SUPPLEMENTAL REPLY – MARTINREA INTERNATIONAL, INC.")

DPH Holdings Corp. and its affiliated reorganized debtors in the above-captioned cases (collectively, the "Reorganized Debtors"), hereby submit this Supplemental Reply With Respect To Proofs Of Administrative Expense Claim Numbers 18722 And 19714 (the "Supplemental Reply") filed by Martinrea International, Inc. (the "Claimant") and respectfully represent as follows:

- 1. On April 26, 2011, the Reorganized Debtors filed the Reorganized Debtors' Statement Of Disputed Issues With Respect To Proofs Of Administrative Expense Claim Numbers 18722 And 19714 (Martinrea International, Inc.) (Docket No. 21235) (the "Statement of Disputed Issues").
- 2. Because the Claimant has not filed a supplemental response, the Statement of Disputed Issues is uncontested and the Reorganized Debtors rely upon the Statement of Disputed Issues.<sup>1</sup>
- 3. In the event that the Claimant files a supplemental response or otherwise raises additional issues contesting the assertions in the Statement of Disputed Issues, the Reorganized Debtors reserve all of the their rights to (a) supplement this Supplemental Reply and (b) assert that the Claimant has not followed the claims objection procedures approved by this Court.

WHEREFORE the Reorganized Debtors respectfully request that this Court enter an order (a) disallowing and expunging each of proof of administrative expense claim number

On May 13, 2011, the Claimant sent information to the Reorganized Debtors claiming that \$6,766.04 is allegedly still owed by the Reorganized Debtors on account of proof of administrative expense claim number 18722 ("Claim 18722"). The Claimant did not provide any information regarding proof of administrative expense claim number 19714 ("Claim 19714," and together with Claim 18722, the "Claims"). The Reorganized Debtors were unable to verify that any amounts remained owing on account of the Claims and reserve all of the their rights to contest any further assertions by the Claimant regarding any amounts owed on account of the Claims.

18722 and 19714 in its entirety and (b) granting the Reorganized Debtors such other and further relief as is just.

Dated: New York, New York

May 25, 2011

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ John K. Lyons
John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler
155 North Wacker Drive
Chicago, Illinois 60606

- and -

Four Times Square New York, New York 10036

Attorneys for DPH Holdings Corp., et al., Reorganized Debtors